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**From:** Kevin.Fortune@epa.ohio.gov [Kevin.Fortune@epa.ohio.gov]  
**Sent:** 12/27/2017 9:50:35 PM  
**To:** Thompson, Lisa [Thompson.Lisa@epa.gov]; Hambrick, Amy [Hambrick.Amy@epa.gov]  
**Subject:** FW: EOG - Chippewa Station Air Permit Questions

Lisa and Amy,

I deal with OOOO/OOOOa quite a bit and but was obviously unsure with this scenario, please see the emails below and let me know if what Liz is telling me is correct and they wouldn't be subject to OOOOa. If you need more clarity or the application section she is referring to let me know.

Thanks,  
Kevin

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**From:** Elizabeth H Gayne [mailto:Elizabeth.H.Gayne@dominionenergy.com]  
**Sent:** Wednesday, December 27, 2017 11:59 AM  
**To:** Fortune, Kevin <Kevin.Fortune@epa.ohio.gov>  
**Cc:** Abby M Credicott <abby.m.credicott@dominionenergy.com>; Thomas R Andrade <Thomas.R.Andrake@dominionenergy.com>  
**Subject:** RE: EOG - Chippewa Station Air Permit Questions

Hi Kevin –

I wanted to follow up with you after leaving you a voicemail. In the permit application submitted for Chippewa Station on 12/20, applicability of NSPS OOOOa is reviewed in section 3.1.3.3 (pg. 3-3). Chippewa Station is located downstream of the local distribution company point of custody transfer station and is used exclusively for distribution of Natural Gas to customers of EOG. NSPS OOOOa regulates natural gas production facilities, wells, and transmission facilities, however does not extend into the distribution sector. Because of this, Chippewa Station is not an affected facility as defined by OOOOa.

Please feel free to call me if you have any questions.

Liz

Elizabeth Gayne  
Manager, Environmental - Dominion Energy Corporate Air Programs  
5000 Dominion Boulevard, Glen Allen, Virginia 23060  
804-273-3128 (office) 804-201-3418 (cell)  
[Elizabeth.H.Gayne@dominionenergy.com](mailto:Elizabeth.H.Gayne@dominionenergy.com)

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**From:** Kevin.Fortune@epa.ohio.gov [mailto:Kevin.Fortune@epa.ohio.gov]  
**Sent:** Wednesday, December 27, 2017 10:44 AM  
**To:** Thomas R Andrade (Services - 6)  
**Cc:** Abby M Credicott (Services - 6); Elizabeth H Gayne (Services - 6)  
**Subject:** [External] EOG - Chippewa Station Air Permit Questions

T.R., Abby and Liz,

I am reviewing the application and noticed the fugitive emissions/leaks source (P019) has essentially seen emissions increases with each modification to the facility. I believe 40 CFR Part 60, Subpart OOOOa is now subject due to 60.5365a(j)(1) & (2). This will require this source to have periodic LDAR and be included in the PTI.

Also, it appears the two new engines/compressors will have to comply with 60.5385a, which is the rod packing requirements. Making sure Dominion agrees with these requirements since it wasn't included in the application.

I think I missed this with emissions unit B015 (Engine #8), we will have to modify that permit to include OOOOa.

Let me know if you have any questions and if you agree.

Thanks,

**Kevin Fortune**

Environmental Specialist 2  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
(330) 963-1152



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